

Before the
Federal Communications Commission
Washington, DC 20554

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FILE DEC 27 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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DEC 27 1991

FCC MAIL BRANCH

In the matter of: >
Amendment of part 97 of the >
Commission's Rules Governing >
Amateur Radio Services > RM-7869
Regarding Repeater and >
Auxiliary Operation in the >
1.25 Meter Band >

To: The Commission

PETITION FOR RULE MAKING

I, Glen Ireland, KK6DX, hereby respectfully submit my request to the Federal Communications Commission to NOT take action on this Petition For Rule Making, RM-7869, as submitted by the American Radio Relay League.

When the lower 2 MHz of the 1.25 meter band was transferred to the commercial interest it was incumbent on the Amateur Community to move above 220.000 MHz. This has caused considerable expense to all Amateurs, particularly in California where the 1.25 mtr. band is heavily used. Our 220 S.M.A. has done a very fine job of relocating FM repeaters with the least amount of difficulty to the greatest number of users. As result of a very widely advertised S.M.A. meeting in the spring of 1990, of all Amateurs interested in the 222 - 225 Mhz band, the wishes of all segments of the band represented were met, discussed, voted on and adopted by those Amateurs present.

The non-FM interests who are backing this request for Rule Making did not see fit to participate in the S.M.A.

meeting that developed the current Band Plan in effect in Southern California. Nor did they approach the S.M.A. seeking a way to solve their needs. Instead they request the ARRL to submit a request for a subband in the 220 MHz band that would be 300 % greater than they enjoyed pre-8714. If the percentage of the band given up as a result of 8714 represents 33 percent of the former band, then it would seem just that each segment of the now available frequency spectrum be utilized in the same proportion as pre - 8714. If this group would have requested consideration of their needs through the S.M.A., I feel certain a fair agreement could have been achieved.

If the request the ARRL makes is granted, the losses to the FM repeater segment will be tremendous. It is my opinion that the majority of use is in the FM repeater segment and the greatest amount of users would be better served. SSB, EME, CW, WEAK SIGNAL and EXPERIMENTAL are seriously under utilized in spite of unsubstantiated claims to the contrary.

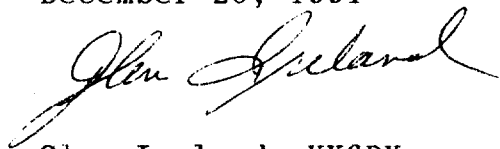
The ARRL has for many years supported Regional Frequency Coordination by Amateurs themselves without any direction from the F.C.C. Now it seems the ARRL is quite willing to have the F.C.C. make the decisions for them.

The Amateur Radio Service needs to continue to be a self regulating group, within the frame work of good operating practice and sense of fair values determined by the Amateur Community themselves.

Again, I ask that you NOT approve RM-7869.

Respectfully submitted

December 20, 1991

A handwritten signature in cursive script that reads "Glen Ireland". The signature is written in dark ink and is positioned above the printed address.

Glen Ireland, KK6DX
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